

# American Craft Spirit Association Guidance Note for Digital Marketing Communications

## Introduction

This Guidance Note for responsible digital marketing communications is an integral part of the ACSA's Code of Advertising Practices. These notes are an extension of the Code and should be read in conjunction with its provisions.

## Scope

This Guidance Note applies to branded digital marketing communications (paid and unpaid) of ACSA members, including communications on the ACSA member's website and other digital platforms such as social network sites and blogs, as well as mobile communications and applications.

## Basic Principles

1. Digital marketing communications are intended for consumers of legal purchase age.
2. Digital marketing communications should be placed only in media where at least 71.6% of the audience is reasonably expected to be of the legal purchase age, or where the digital platform provides the ability to directly communicate to an audience of legal purchase age individuals.
3. Digital marketing communications on a digital platform controlled by the ACSA member that involves "direct interaction" with a user should require "age affirmation" by the user prior to direct user engagement.

"Direct interaction" is a two-way communication between the user and the ACSA member on a digital platform controlled by the ACSA member. It occurs when the ACSA member directly interacts with a user, such as responding to a direct communication from the user.

"Age affirmation" is a process by which users affirm they are of legal purchase age at their place of residence.

4. "User-generated content" on a digital platform controlled by the ACSA member must be monitored and moderated on a regular basis. When content is determined to be inappropriate, the inappropriate material should be removed promptly.

"User-generated content" is material (including text, pictures, audios, and videos) that has not been created by the ACSA member, but by a user.

5. Digital marketing communications that are "forwardable" by users should include instructions to users downloading the content that they should not forward these materials to underage individuals.

“Forwardable” content is any branded digital content that is designed or enabled to be shared, such as with a share, download, or email “button click.”

6. Social Responsibility Statements should be included in all digital marketing communications where practicable.

7. Digital marketing communications must respect user privacy. Privacy policies govern the collection of personal information from adults of legal purchase age and encompass any direct digital marketing or advertising whether conducted through a social networking site, website, or other digital platform, and must ensure the following:

- Clear information must be provided about collection and use of personal data. Under no circumstances will the information collected be sold or shared with third parties unrelated to the ACSA member.
- Prior to the collection of any information, the ACSA member will require that individual to affirm that they are of legal purchase age, and user information can be collected only from those individuals who are of the legal purchase age.
- Users should be encouraged to read the privacy statement before submitting their information.
- The ACSA member shall employ a mechanism for a user to “opt-in” before receiving a direct digital marketing communication and to “opt-out” and discontinue receiving such direct communications.
- Measures should be taken to keep user information secure and protected from loss or theft.